

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA;</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil No.</b>
	)	
<b>v.</b>	)	
	)	
<b>STEVEN M. BRAZILE, and</b>	)	
	)	
<b>LORRAINE BRAZILE;</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**COMPLAINT**

Plaintiff, the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Joshua M. Jones, Assistant United States Attorney for this District, upon information and belief and for its cause of action, alleges:

**JURISDICTION AND VENUE**

1. This is a civil action brought by the United States of America seeking avoidance of fraudulent transfers, and this Court has jurisdiction pursuant to 28 U.S.C. § 1345.
2. This action is brought pursuant to 28 U.S.C. §§ 3301-3308 which provides the procedure for the United States to seek relief against a fraudulent transfer as to a debt owed to the United States
3. Venue is proper in the Eastern District of Missouri pursuant to 28 U.S.C. § 1391
4. Divisional venue is proper in the Eastern Division pursuant to L.R. 3-2.07(A)(1).

**PARTIES**

5. Plaintiff is the United States of America.
6. Defendant Steven M. Brazile is a resident of St. Louis City, Missouri.

7. Defendant Lorrain Brazile is a resident of St. Louis City, Missouri.

**FACTS COMMON TO ALL COUNTS**

**Defendant Steven M. Brazile's Criminal Conviction**

8. On July 30, 2013, Defendant Steven M. Brazile pleaded guilty before the United States District Court for the Northern District of Illinois to one count of transportation of securities obtained by fraud, in violation of 18 U.S.C. § 2314. *See* N.D. Ill. Case No. 1:13-CR-00560.

9. Prior to his conviction, Defendant Steven Brazile worked as a vice-president at Hillshire Brands (f/k/a Sara Lee Corporation) (hereinafter "Hillshire Brands"), and used his authority to approve false and fraudulent invoices for goods and services that were diverted to accounts controlled by Defendant Steven Brazile. As part of his voluntary plea agreement with the United States, Defendant Steven Brazile acknowledged that he owed restitution in the amount of \$3,902,880.85.

10. Pursuant to 18 U.S.C. § 3613(c), the United States has a lien against all of Defendant Steven M. Brazile's property and rights to property by virtue of the criminal monetary judgment entered against him. This lien arose as of the date the U.S. District Court for the Northern District of Illinois entered judgment against him: November 13, 2013. *See* N.D. Ill. Case No. 1:13-CR-00560, Doc. #47.

11. As of the date of this pleading, Defendant Steven M. Brazile still owes \$3,108,221.98 in restitution.<sup>1</sup>

12. Upon completion of his term of imprisonment, the Northern District of Illinois transferred Defendant Steven Brazile's criminal case to the Eastern District of Missouri, where he remains on supervised release. *See* E.D. Mo. Case No. 4:17-CR-00344-RLW.

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<sup>1</sup> The United States is attempting to forfeit a vehicle belonging to Defendant Steven M. Brazile which, if successful, could reduce the current restitution balance.

**Defendant Steven M. Brazile's Pension Benefits**

13. On November 3, 2015, the United States served Hillshire Brands with a "citation to discover assets" pursuant to 18 U.S.C. § 3613(a) and (f). Hillshire Brands responded by indicating that it had in its possession or control a pension benefit belonging to Defendant Steven M. Brazile.

14. Specifically, Hillshire Brands submitted to the United States an Answer indicating that Defendant Steven M. Brazile had a qualified salaried pension plan with the following payment schedule:

<u><b>Type of Payout</b></u>	<u><b>Amount</b></u>
One-time lump sum benefit payable on April 1, 2016 (age 55)	\$40,031.32
Monthly annuity from age 55-65, beginning on April 1, 2016	\$117.29 per month
One-time lump sum benefit payable on April 1, 2026 (age 65)	\$72,784.21
Life-time annuity, beginning on April 1, 2026	\$368.71 per month

15. Hillshire Brands submitted an amended Answer to the United States indicating that Defendant Steven M. Brazile has non-qualified supplemental executive retirement plan with the following scheduled benefits:

<u><b>Type of Payout</b></u>	<u><b>Amount</b></u>
One-time lump sum payment paid in July 2010	\$18,496.73
Monthly Payments	\$1,258.89 per month 5-year installments

**Defendants' Divorce Proceedings**

16. Defendant Steven Brazile was married to Defendant Lorraine Brazile. On July 25, 2013. Defendant Lorraine Brazile filed a suit for dissolution of marriage with the Circuit Court of St. Louis County, Missouri, case number 13SL-DR04448. Defendant Lorraine Brazile filed for

divorce only a few days prior to Defendant Steven M. Brazile's change of plea hearing in his criminal case. Upon information and belief, and based on the facts set forth herein, the United States alleges that Defendants' divorce was a "sham divorce," done solely for the purpose of moving assets in order to prevent the United States using those assets to pay victim restitution.

17. On August 29, 2013, Defendants entered into a voluntary Property Settlement and Separation Agreement ("Property Agreement") as part of the divorce proceedings. On the same date, the St. Louis Circuit Court entered a final judgment of dissolution awarding Defendant Lorraine Brazile \$1,700 a month in child support. To calculate the child support amount, Defendants used a monthly salary of \$8,333. However, Defendant Steven M. Brazile reported to the U.S. Probation Office (as part of the presentence investigation conducted in his criminal case) that he had been unemployed since 2009. Upon information and belief, Defendants mutually agreed to the child support amount solely for the purpose of reducing the amount of Defendant Steven M. Brazile's future salary that could be garnished by the United States to pay victim restitution.

18. As part of the divorce judgment, Defendants agreed that Lorraine Brazile should receive a portion of Steven M. Brazile's pension benefit, and the divorce court ordered the Defendants to submit a qualified domestic relations order ("QDRO") to effect the transfer.

19. On August 24, 2016, Defendants submitted a QDRO (the "August QDRO") to the divorce court. The August QDRO assigned to Defendant Lorain Brazile 100% of Defendant Steven M. Brazile's April 2016 lump sum benefit amount (\$40,031.32) and the monthly annuity benefits. Upon information and belief, Defendants submitted the August QDRO in an attempt to move assets from Defendant Steven M. Brazile (who owed criminal restitution) to Defendant Lorain Brazile (who did not) in an attempt to avoid paying restitution.

20. The judgment of dissolution entered by the divorce court awarded Defendant Lorraine Brazile essentially all of the marital assets that were not subject to forfeiture. The following chart shows those assets awarded to Defendant Lorraine Brazile and those assets awarded to Defendant Steven M. Brazile.

<u>Marital Asset</u>	<u>Value in marital settlement</u>	<u>% Awarded to Steven</u>	<u>% Awarded to Lorraine</u>	<u>Value Awarded to Steven</u>	<u>Value Awarded to Lorraine</u>
4715-17 Vienna Ave	\$145,000	0%	100%	\$0	\$145,000
Honda Odyssey	\$5,000	0%	100%	Forfeited	
First Community CU Checking	\$86,600	0%	100%	\$0	\$86,600
BOA Checking	\$54,982	0%	100%	\$0	\$54,982
BOA Savings	\$18,983	0%	100%	\$0	\$18,983
Oppenheimer acct.	\$750,000	0%	100%	Forfeited	\$500,000
Lincoln Benefit Universal Life	\$15,437	0%	100%	\$0	\$15,437
Lincoln Benefit Universal Life	\$29,185	0%	100%	\$0	\$29,185
Fidelity IRA	\$3,000	0%	100%	\$0	\$3,000
Fidelity IRA Rollover	\$4,000	0%	100%	\$0	\$4,000
Hillshire Brand Pension	\$164,646	69%	31%	\$112,816	\$51,831
Fidelity IRA	\$95,000	0%	100%	\$0	\$95,000
GTO	\$65,000	100%	0%	Forfeited	\$0
Mustang	\$70,000	100%	0%	Forfeited	\$0
Trailer	\$6,500	100%	0%	Forfeited	\$0
Trailer	\$3,000	100%	0%	Forfeited	\$0
Silverado	\$13,000	100%	0%	Forfeited	\$0
GTO	\$70,000	100%	0%	Forfeited	\$0
Suburban	\$18,000	100%	0%	Forfeited	\$0
Volvo	\$3,000	100%	0%	Forfeited	\$0
Chevrolet	\$3,000	100%	0%	Forfeited	\$0
Cougar	\$5,000	100%	0%	Forfeited	\$0
Firebird	\$7,000	100%	0%	Forfeited	\$0
GTO	\$6,500	100%	0%	Forfeited	\$0
Mustang	\$5,000	100%	0%	Forfeited	\$0
Firebird	\$1,000	100%	0%	Forfeited	\$0
Mustang	\$7,000	100%	0%	Forfeited	\$0
Chevelle	\$3,000	100%	0%	Forfeited	\$0

Grand Prix	\$5,000	100%	0%	Forfeited	\$0
Satellite	\$5,000	100%	0%	Forfeited	\$0
Catalina	\$5,000	100%	0%	Forfeited	\$0
F100	\$75,000	100%	0%	Forfeited	\$0
Anheuser-Busch CU Account	\$1,000	100%	0%	Forfeited	\$0
PNC acct.		100%	0%	\$0	\$0
PNC acct.	\$126,674	100%	0%		\$0
E-Trade acct.	\$2,000	100%	0%	\$2,000	\$0
Oppenheimer IRA	\$550,000	0%	100%	\$0	\$550,000
Total				\$114,816	\$1,554,018

21. After Defendant Steven M. Brazile's release from the Bureau of Prisons, he moved into the family home awarded to Defendant Lorraine Brazile as part of the divorce. Furthermore, he started working for American Medical Billing Exchange, a company owned by Defendant Lorraine Brazile. Despite the fact that her ex-husband—who was ordered to pay child support to her—was working for her, Defendant Lorraine Brazile did not garnish his wages to pay child support.

22. On June 23, 2016, the United States filed a motion in the United States District Court for the Northern District of Illinois for turnover with respect to the lump sum benefits owed by Hillshire Brands to Defendant Steven M. Brazile. Defendant Steven M. Brazile responded to the motion by arguing that the August QDRO assigned 100% of the \$40,031.32 lump-sum benefit to Defendant Lorraine Brazile, and that the August QDRO took priority over the United States' judgment lien.

23. Upon learning that the United States may have a superior interest in the upcoming April 2026 lump-sum benefit of \$72,784.21, Defendants submitted a second QDRO to the divorce court on November 30, 2016 (the "November QDRO"). The November QDRO purported to assign Defendant Lorraine Brazile 100% of the interest in the April 2026 lump-sum benefit. Upon information and belief, Defendants submitted the November QDRO in order to shield those assets from seizure by the United States.

24. The activities by Defendants throughout the divorce proceedings, including the August QDRO and November QDRO, demonstrate that they actively attempted to move the vast majority of non-exempt assets solely to Defendant Lorrain Brazile in order to shield the assets from seizure by the United States. This is further demonstrated by the inequitable distribution of marital assets shown in the chart above, and the fact that Defendants overstated their incomes in order to justify a high monthly child support payment owed by Defendant Steven M. Brazile to Defendant Lorraine Brazile (as Defendants are aware, child support payments are exempt from levy).

25. Upon information and belief, Defendants did not make the divorce court aware of the criminal conviction or Defendant Steven M. Brazile's obligation to pay millions of dollars to the victim of his crime.

July 2016 Deposition Testimony

26. On July 25, 2016, the United States deposed Defendant Steven M. Brazile regarding his financial assets. During the deposition, Defendant Steven M. Brazile testified that his ex-wife was represented by counsel throughout the divorce, and that he proceeded pro se.

27. When questioned about the inequitable distribution of marital assets, Defendant testified as follows:

Q: What I'm trying to determine is how did this come about that your wife received all the assets in the divorce other than the vehicles that would soon be subject to forfeiture?

A: I think that's a question for Lorraine's attorneys. You know, I was in—I had—you know, my take all during the period of time was I had behaved terribly and Lorraine was suing me for divorce; so I was trying to follow the advice of legal counsel and that's what I did.

Q: But you didn't have a retained attorney for the divorce?

A: Me? No. Lorraine did.

September 2017 Home Visit

28. On September 13, 2017, probation officers for the Eastern District of Missouri conducted a home visit at Defendants' home. While there, they discovered that Defendant Steven M. Brazile is living with Defendant Lorraine Brazile (his ex-wife) and their children. During interviews, Defendant Steven M. Brazile admitted to the probation officers that he was living with his ex-wife, raising their kids together as a "family." Defendants send their three kids to private and costly high schools. Upon information and belief, Defendants share the same bed at their family residence.

29. The facts learned as a result of the probation officer's home visit further demonstrates that Defendants entered into a "sham divorce" for the sole purpose of transferring assets to Defendant Lorraine Brazile that could otherwise have been used to pay victim restitution.

**COUNT I-FRAUDULENT TRANSFER IN VIOLATION OF 28 U.S.C. § 3304(A)(2)**  
**AGAINST ALL DEFENDANTS**

30. The United States restates the allegations and averments contained in Paragraphs 1-29 as if fully set forth herein.

31. Defendants' transfer of property as part of their "sham divorce" was a fraudulent transfer.

32. The debt owed as a result of the criminal judgment arose before the transfers described above, and is therefore an antecedent debt.

33. The assets transferred to Defendant Lorraine Brazile's as part of the final divorce decree and subsequent QDROs could have been used to pay victim restitution. The United States is required by the Mandatory Victim Restitution Act to use available assets to help pay the victims of crime. Defendants have frustrated the United States' ability to obtain restitution by fraudulently inequitably transferring funds from Defendant Steven M. Brazile to Defendant Lorraine Brazile as part of their "sham divorce."



34. Defendant Steven M. Brazile made the transfer described above to an insider, Defendant Lorraine Brazile, his then wife.

35. Defendant Steven M. Brazile, recognized, or should have recognized, that his liability pursuant to the restitution order would be substantially more than his net worth and his ability to pay those judgments.

36. Defendant Lorraine Brazile had reasonable cause to believe that the restitution judgment against Defendant Steven M. Brazile was substantially more than his net worth and his ability to pay those judgments.

WHEREFORE, the United States prays this Court enter judgment in its favor, against Defendants, and grant the following relief:

- a. Order that the division of property and award of pension benefits and child support included in the final judgment in Defendants' divorce case, and subsequent QDROs, fraudulent and void;
- b. Enter judgment in favor of the United States against Defendants for the full value of the property (including pension benefits and child support orders) transferred from Defendant Steven M. Brazile to Defendant Lorraine Brazile as part of the final judgment in their divorce case and subsequent QDROs;
- c. Order that, pursuant to 18 U.S.C. § 3613(c), the United States has a lien against that property fraudulently transferred from Defendant Steven M. Brazile to Defendant Lorraine Brazile, such that the United States can take immediate action to seize that property to pay victim restitution; and
- d. Award the United States such other relief as may be appropriate and just.

**COUNT II-FRAUDULENT TRANSFER IN VIOLATION OF 28 U.S.C. § 3304(B)(1)(A)**  
**AGAINST ALL DEFENDANTS**

37. The United States restates the allegations and averments contained in Paragraphs 1-36 as if fully set forth herein.

38. Defendant Steven M. Brazile made the transfers to Defendant Lorraine Brazile with actual intent to hinder, delay, or defraud the United States, a creditor.

39. Defendant Steven M. Brazile made the transfers described above to an insider, Defendant Lorraine Brazile, his then wife. *See* 28 U.S.C. § 3304(b)(2)(A). Defendant Steven M. Brazile made the transfers to Defendant Lorraine Braile after Defendant Steven M. Brazile entered into a Plea Agreement whereby he acknowledged that the total amount of restitution owed would be \$3,902,880.85. *See* 28 U.S.C. § 3304(b)(2)(D) and (J).

40. The transfer made pursuant to the Property Agreement and subsequent QDROs was substantially all Defendant Steven M. Brazile's assets and Steven M. Brazile became insolvent after the transfer. *See* 28 U.S.C. § 3304(b)(2)(E) and (I).

41. WHEREFORE, the United States prays this Court enter judgment in its favor, against Defendants, and grant the following relief:

- a. Order that the division of property and award of pension benefits and child support included in the final judgment in Defendants' divorce case, and subsequent QDROs, fraudulent and void;
- b. Enter judgment in favor of the United States against Defendants for the full value of the property (including pension benefits and child support orders) transferred from Defendant Steven M. Brazile to Defendant Lorraine Brazile as part of the final judgment in their divorce case and subsequent QDROs;
- c. Order that, pursuant to 18 U.S.C. § 3613(c), the United States has a lien against that property fraudulently transferred from Defendant Steven M. Brazile to Defendant

Lorraine Brazile, such that the United States can take immediate action to seize that property to pay victim restitution; and

d. Award the United States such other relief as may be appropriate and just.

**COUNT III-FRAUDULENT TRANSFER IN VIOLATION OF 28 U.S.C. § 3304(B)(1)(B)**  
**AGAINST ALL DEFENDANTS**

42. The United States restates the allegations and averments contained in Paragraphs 1-41 as if fully set forth herein.

43. Defendant Steven M. Brazile made the transfers described above without receiving a reasonably equivalent value in exchange for the transfer.

44. Defendant Steven M. Brazile, recognized, or should have recognized, that his liability pursuant to the restitution order would be substantially more than his net worth and his ability to pay those judgments.

WHEREFORE, the United States prays this Court enter judgment in its favor, against Defendants, and grant the following relief:

- a. Order that the division of property and award of pension benefits and child support included in the final judgment in Defendants' divorce case, and subsequent QDROs, fraudulent and void;
- b. Enter judgment in favor of the United States against Defendants for the full value of the property (including pension benefits and child support orders) transferred from Defendant Steven M. Brazile to Defendant Lorraine Brazile as part of the final judgment in their divorce case and subsequent QDROs;
- c. Order that, pursuant to 18 U.S.C. § 3613(c), the United States has a lien against that property fraudulently transferred from Defendant Steven M. Brazile to Defendant Lorraine Brazile, such that the United States can take immediate action to seize that property to pay victim restitution; and

d. Award the United States such other relief as may be appropriate and just.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s/ Joshua M. Jones  
Joshua M. Jones, Mo. Bar #61988  
Assistant United States Attorney  
Thomas F. Eagleton U.S. Courthouse  
111 South Tenth Street, 20<sup>th</sup> Floor  
St. Louis, MO 63102  
(314) 539-2310  
Fax: (314) 539-2287  
[joshua.m.jones@usdoj.gov](mailto:joshua.m.jones@usdoj.gov)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

United States of	)	
America	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
Steven M. Brazile &	)	
Lorraine Brazile	)	
	)	
Defendant,	)	
	)	

**ORIGINAL FILING FORM**

**THIS FORM MUST BE COMPLETED AND VERIFIED BY THE FILING PARTY  
WHEN INITIATING A NEW CASE.**

☐ THIS SAME CAUSE, OR A SUBSTANTIALLY EQUIVALENT COMPLAINT, WAS  
PREVIOUSLY FILED IN THIS COURT AS CASE NUMBER \_\_\_\_\_  
AND ASSIGNED TO THE HONORABLE JUDGE \_\_\_\_\_.

☒ THIS CAUSE IS RELATED, BUT IS NOT SUBSTANTIALLY EQUIVALENT TO ANY  
PREVIOUSLY FILED COMPLAINT. THE RELATED CASE NUMBER IS 4:17-CR-344 AND  
THAT CASE WAS ASSIGNED TO THE HONORABLE Ronnie L. White. THIS CASE MAY,  
THEREFORE, BE OPENED AS AN ORIGINAL PROCEEDING.

☐ NEITHER THIS SAME CAUSE, NOR A SUBSTANTIALLY EQUIVALENT  
COMPLAINT, HAS BEEN PREVIOUSLY FILED IN THIS COURT, AND THEREFORE  
MAY BE OPENED AS AN ORIGINAL PROCEEDING.

**The undersigned affirms that the information provided above is true and correct.**

Date: 01/11/2018

/s/ Joshua M. Jones  
Signature of Filing Party

JS 44 (Rev. 06/17)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Joshua M. Jones, Assistant United States Attorney (314.539.2310)  
111 S. 10th Street, Ste 20.333  
St. Louis, Missouri 63102

**DEFENDANTS**Steven M. Brazile &  
Lorraine Brazile

County of Residence of First Listed Defendant St. Louis City  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. 3304

Brief description of cause:

Suit to set aside fraudulent transfer of property and other relief**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

**DEMAND \$**

CHECK YES only if demanded in complaint:

**JURY DEMAND:**☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE Ronnie L. WhiteDOCKET NUMBER 4:17-CR-344

DATE

SIGNATURE OF ATTORNEY OF RECORD

01/11/2018

/s/ Joshua M. Jones

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_



AO 440 (Rev. 12/09) Summons in a Civil Action

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UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

United States of America

\_\_\_\_\_  
*Plaintiff*

v.

Steven M. Brazile & Lorraine Brazile

\_\_\_\_\_  
*Defendant*

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Civil Action No.

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* Steven M. Brazile  
4715 Vienna Avenue  
Saint Louis, MO 63109

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Joshua M. Jones  
Assistant United States Attorney  
111 S. 10th Street, Ste 20.333  
St. Louis, MO 63102

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

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Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:



AO 440 (Rev. 12/09) Summons in a Civil Action

# UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

United States of America

*Plaintiff*

v.

Steven M. Brazile & Lorraine Brazile

*Defendant*

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)  
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)

Civil Action No.

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Lorraine Brazile  
4715 Vienna Avenue  
Saint Louis, MO 63109

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Joshua M. Jones  
Assistant United States Attorney  
111 S. 10th Street, Ste 20.333  
St. Louis, MO 63102

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

AO 440 (Rev. 12/09) Summons in a Civil Action (Page 2)

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*: \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: